

Exhibit 2

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK
4 -----
5 SPENCER MEYER, individually and on
6 behalf of those similarly situated,
7 Plaintiffs,
8 vs. 1:15 Civ. 9796 (JSR)
9 TRAVIS KALANICK,
10 Defendant.
11 -----
12
13 DEPOSITION OF MIGUEL SANTOS-NEVES
14
15 Tuesday, June 14, 2016
16 9:13 a.m.
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22 Reported by:
23 Joan Ferrara, RPR, RMR, CRR
24 Job No. 174299
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1
2 June 14, 2016
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9:00 a.m.

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9 New York, New York
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14 Deposition of MIGUEL
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SANTOS-NEVES, held at the offices of McKool
Smith, One Bryant Park Avenue, New York,
New York, pursuant to Notice, before Joan
Ferrara, a Registered Professional and
Merit Reporter and Notary Public of the
State of New York.

1 M. Santos-Neves
2 not on the e-mail chain. Can you take a
3 look at it and tell me if you recognize the
4 subject matter?

5 A. During preparation for
6 deposition, allusion was made to this
7 particular document, but this is the first
8 time that I'm seeing it.

9 Q. So the top e-mail is an e-mail
10 from Matthew Moneyhon to Todd Egeland, May
11 20th of this year.

12 And Mr. Moneyhon states:

20 Is that the first time that you
21 heard that you -- that Mr. Moneyhon
22 believes you breached the research
23 protocol?

24 A Yes

25 0. Were you ever informed that you